

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
*ex rel. GORDON F.B. ONDIS* )  
Plaintiff, )  
vs. )  
CITY OF WOONSOCKET, RHODE )  
ISLAND; SUSAN D. MENARD, in )  
her individual capacity and in her ) CIVIL NO. 05-10312-MLW  
capacity as Mayor of the City of )  
Woonsocket, Rhode Island; JOEL D. )  
MATHEWS, in his individual )  
capacity and in his capacity as Director )  
of Planning and Community Devel- )  
opment of the City of Woonsocket, Rhode )  
Island; PAULETTE MILLER, in her )  
individual capacity and in her capacity )  
as Assistant Director of Planning and )  
Community Development of the City of )  
Woonsocket, Rhode Island; OWEN T. )  
BEBEAU, in his individual capacity )  
and in his capacity as Director of )  
Human Services of the City of )  
Woonsocket, Rhode Island; and )  
MICHAEL ANNARUMMO, in his )  
individual capacity and in his capacity )  
as Director of Administration and Director )  
of Public Works of the City of Woonsocket, )  
Rhode Island; )  
Defendants. )

**RELATOR'S CONDITIONAL MOTION FOR LEAVE TO FILE SUR-REPLY  
MEMORANDUM**

Relator herewith makes request for leave of Court to file a sur-reply if  
Defendants' motion to file a reply memorandum is granted.

As reason therefore, Relator asserts that fairness and equity require that Relator be given an opportunity to address any argument contained in the reply memorandum of Defendants.

Relator seeks twenty (20) days from the allowance of this motion to file such sur-reply. This is the same time taken by Defendants to prepare and file their reply memorandum from the date of filing of Relator's objection to motion to dismiss.

Respectfully Submitted,

**Government of the United States  
*ex rel. Gordon F.B. Ondis***

BY HIS ATTORNEY

/s/ Leon A. Blais

---

Leon A. Blais (BBO#652595)

BLAIS PARENT & QUINN  
20 Cabot Blvd  
Suite 300  
Mansfield, MA 02048  
508 618-1280  
617 812-0459 fax  
[LBlais@BlaisParent.com](mailto:LBlais@BlaisParent.com)

**Certificate of Service**

The undersigned counsel hereby certifies that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. All counsel of records are such registered participants.

Dated: June 23, 2006

/s/ Leon A. Blais